



Memorandum

To: File

From: Brendan MacDonald, Michael Valentino, and Jose Reyes

Date: December 19, 2011

Subject: PSA Inspections and Recommendations

Objective

The objective of the PSA Inspections is to help identify potential sources of VOC groundwater contamination, and identify potential sampling locations for subsequent PSA investigations. The inspections consisted of walkovers and informational surveys of PSAs previously identified by EPA and at several other PSAs identified during discussions with EPA. The inspections included visual inspection of the interiors of the buildings and the exterior facility property for past and present disposal or release areas (floor drains, discharge pipes, waste handling, etc.), discussions with current owners/operators, and search of PREQB records for additional historical information regarding operations and waste disposal. See below for the list of properties where PSA inspections were performed. Table 1 presents the proposed boring locations based on physical evidence observed during the PSA inspections and analytical results from previous sampling events, where available.

List of Properties

Southern Area

- Wallace Silversmith
- Pitusa and National Lumber
- Former Baytex
- CC Label
- Pace Analytical
- General Electric
- Garaje Rodriguez
- Acorn Dry Cleaners

Northern Area Properties

- Fenwal Baxter
- Former PCB Horizon (HP)
- Abandoned Gulf Gas Station

December 19, 2011

Page 2

Wallace Silversmith

Brendan MacDonald (CDM) and Jose Reyes (CDM) conducted an interview and performed a site walkover with Luis A. Santiago Figueroa (General Manager, Wallace Silversmiths) on September 8, 2011 between 2:00 PM and approximately 5:00 PM.

Mr. Santiago has been an employee since 2002, when Lifetime Brands purchased the operation from Syntec. Wallace has been operating at this property for approximately 30 years. Wallace currently operates from 7:00 AM to 3:30 PM, five days per week.

Wallace's process is roughly described as follows:

1. Melting of 1000-ounce silver ingots into what is termed 'popcorn'
2. Mixing of popcorn with copper at a rate of 7.5%; this mixture is what is known as 925 Sterling
3. Mixing into one coil-type furnace
4. Pouring into one 6-inch by 1-inch bar
5. Forming via rolling, hammer or hydraulic press
6. Finishing via lathe
7. Quality Control inspection
8. Wrapping and shipping

Chemicals used onsite include:

1. Acids, including nitric acid, muriatic acid, and (historically) sulfuric acid. Acids were mixed with water (50/50) for etching. These chemicals were recovered and transported off-site for disposal. MSDSs for acids are available onsite.
2. TCE (historically); Wallace reportedly disposed of unused chemicals, Clean Harbors cleaned their TCE tank, and all associated waste was transported off-site for disposal.

Wallace is a Small Quantity Generator (SQG). Wastes include universal waste, acids (~1/3 drum/year), oil (PR Used Oil picks up 2-3 drums/year from the facility); cloth from etching gloves is disposed through Induchem.

Floor drains observed included one approximately one-inch diameter drain in the process area which was closed around 2002 by covering/filling it with cement.

Storage vessels observed onsite include the following:

1. 600-gallon concrete UST which receives water and cement from the sink.
2. 3000-gallon AST
3. 500-gallon AST
4. 300-gallon ASTVibratory tank situated opposite water tanks and west of culvert, which contains residue (paste) characterized as non-hazardous

The onsite supply well (identification '12F50190') is not in use.

Pituso and National Lumber

Jose Reyes visited the facility on September 2, 2011 for a perimeter inspection. CDM attempted several times to coordinate a walkover with a PRIDCO representative or Empresas Pitusa, however no personnel were available to support a site visit.

During the interview at Wallace, Mr. Santiago stated that the Former Wallace (National Lumber) was the site of acid etching and die storage. Mr. Santiago further stated that no operations or storage occurred at PITUSA, and operations moved from the properties in or around 2002.

Former Baytex

Jose Reyes and Michael Valentino (CDM) performed a site walkover on August 30, 2011. No PRIDCO representative was available to provide CDM personnel with access to the facility; CDM obtained a key from Pace Analytical in order to enter the property. CDM tried to establish a contact for this interview but to date has had no success.

CC Label

Jose Reyes and Michael Valentino Interviewed Luis Perez, General Manager, CC Label. CCL Label has occupied the building for 14 years. Luis has been at this location for 10 years.

Luis has limited knowledge of past tenants but said he heard that an above ground diesel tank and some generators were removed prior to CCL Label occupancy. The building was delivered clean and in good condition.

Chemical used on-site:

1. Ink and velocity cleaner. Inks are water-based and are stored inside of the Main Building. No staining was observed in the building.
2. Two 400-gallon above ground storage tanks contain paint sludge.

See site plan for drains/catch basins. No septic tanks were observed. Floor in main printing press area is polish concreted.

The site has three large printing presses and one small printing press. Five to thirty pounds of ink is loaded manually to the printing press and is then pressed onto paper. Water is run over rubber rollers to clean the ink from the rollers. The waste ink sludge is collected in five gallon buckets beneath each press and is then disposed into the waste containers. The other process, cutting and folding labels, does not generate waste.

Ink Sludge and fluorescent lamps are the only types of wastes generated onsite.

December 19, 2011

Page 4

Ink Sludge is stored in 55 gallon drums in an enclosed waste storage area. Drums are placed directly on a concrete floor surrounded by pig socks. One drain in the middle of the storage area goes out to a concrete storage container which can be cleaned in case of any spills. No staining was observed on the waste storage concrete floor during site visit. Waste is sampled and collected by Allied waste approximately 2 times a year. Waste is non-hazardous. They dispose around 400 to 600 gallons of waste in a year. Allied waste also disposes of fluorescent lamps.

Site plans of the facility were not provided.

Pace Pharmaceutical Analytical Laboratory

Interviewed Gustavo Poueymirou, Chemical Hygiene Officer on August 31, 2011.

Pace Environmental Lab operated at this location from 2006-2009. Pace Pharmaceutical Lab has operated at this location from 2009 – 2011. Gustavo has been at this location for 2 years

Gustavo has limited knowledge of past tenants, including Pace Environmental Lab. Building was constructed in 1969. Tenant before Pace was Caribbean Bioresearch (CB). Waste manifests show that CB was at site from at least 1995. Gustavo said they used to perform lab tests on animals. Zulma Nazario, Pace QA Officer, worked during the transition from Caribbean Bioresearch to Pace Analytical. She also confirmed that Bioresearch used to perform tests on animals to measure their reactions to different types of products.

See attached list for chemicals used onsite. Gustavo said that no chlorinated VOCs were used onsite. Chemicals, mostly used as reagents, were properly stored in glass cabinets – oxidizers were separated from corrosives.

One above ground diesel tank is used for backup generator (Approximately 300 Gallons). No underground storage tanks are present onsite.

See site plan for drains/catch basins/floors – no septic tanks were observed. Floor in main laboratory area is tile linoleum and in storage areas, concrete.

The site has two microbiology labs and one chemistry lab divided into gas chromatograph area, wet chemistry analysis area, high performance liquid chromatography (HPLC) area, and a dissolution area. Pace analyzes/certifies chemicals, medical devices, water and pharmaceutical drugs for the pharmaceutical industry. Prior to 2009, Pace was an environmental lab and analyzed soil and water for contaminant concentrations. Prior to that Caribbean Bioresearch occupied the building and allegedly performed lab analysis testing on animals

See attached waste profile sheets submitted to Clean Harbors, Pace's waste disposal firm for types of waste generated. Pace generates waste left over from the analytical processes including chemicals, broken glassware, vials, rags, gloves, and fluorescent lamps. All wastes are initially collected in the lab areas and then are segregated into similar waste streams for disposal.

December 19, 2011

Page 5

Pace has a waste storage area in an annex to the main laboratory building. Hazardous wastes are stored in a concrete room with a raised floor with wooden slats. No drains were observed in this room. Organic wastes were stored in two rooms; one 55-gallon drum in each. Drains were observed in these rooms. The drums were stored above a secondary containment system. Used vials from the gas chromatograph lab were stored in a room above a secondary containment system. Paints and one container of acetone were stored on metal shelves in a room with no secondary containment. Cleaning products and materials were stored next to the organics storage room. A sink was located here. Six drums were observed in the waste storage hallway – awaiting pickup by Clean Harbors. Some were not placed on a secondary containment system. Near the end of the waste storage area, gas canisters of helium, argon, and hydrogen used in the gas chromatograph lab were stored properly. Empty canisters were stored near the full canisters. A concrete sink with two drains was observed in this area. CDM will request Site plans to PRIDCO if they are available.

General Electric

September 7, 2011; 10 AM

Interviewed Lilliam Fernandez, Environmental Manager and Abniel Feliciano Environmental Technician, GE on September 7, 2011. Ms. Fernandez has been an employee since 2006.

GE has Operated onsite for approximately 41 years. 3 shifts are run at the plant: 6:30AM -3:30PM, 3:00PM -11:00PM and 11:00PM -6:00AM, 5 days/week. Work is scheduled on Saturday only on an as needed basis.

GE has three buildings:

- Building #1 is the close injection molding and power press area
- Building #2 is the assembly process line and building
- Building # 3 is the warehouse where the raw material arrives and is stored.

GE San German manufactures circuit breakers. They use polyester (Fenol polistileno) that is placed in the molding area at high temperatures where the exterior of the molding is prepared. They use rolled brass that is cut and power pressed to complete the contact of the breaker.

All material is moved to the assembling area, assembled, stored in boxes, quantified and then placed in 40 foot containers ready for shipping.

Chemicals used onsite:

See Appendix A (MSDSs available onsite)

At Building # 1 a trench drain with a 2-inch diameter pipe was observed running along the floor. The drain exits to the exterior of the building and is not used. The purpose and past use of the drain is unknown. A small drain about 2 inches in diameter and covered w/cement was also observed in Building #1.

Two 10,000 gallon diesel ASTs are onsite in the parking lot of Building #1. Four 300-gallon water ASTs are present onsite and used as backup in case water service is cut.

No wells exist onsite; water is supplied by PRASA.

December 19, 2011

Page 6

SQG: universal waste (PBB to Waste Management), oil (Olein System pick as requested); fluorescent lamps (Clean Harbors).

Garaje Rodriguez

Interviewed German Rodriguez Rivera, Owner of Paint Shop Garaje Rodriguez on August 31, 2011.

Mr. Rodriguez has been at that facility since 1961. The facility has been in operation for 50 years. The facility is open from 8:00AM – 5:00PM, 5 days/week.

Mr. Rodriguez has a shop of 20 x 20 feet in size, with a concrete floor, where he repairs and paints cars. A bathroom inside a small shack with a bathroom inside was observed separate from the main shop. Water for the bathroom is supplied by a 55-gallon drum. Waste is collected in a septic tank located below the bathroom. The bathroom and septic tank are located very close to the creek. Mr. Rodriguez said that he does not generate much waste; the most common waste being the newspaper and strapping tape for covering the car before painting. Mr. Rodriguez cleans the pressure paint gun by adding thinner to it and spraying it on the inside of a drum until the paint gun is clean. Some spillage to the ground may occur during this process. Any additives or residual paint are poured into a drum. He lets the residual evaporate or dry so he does not disposed of any waste.

Chemicals used onsite:

1. Paints
2. Reducers
3. Paint Thinner

No MSDSs available onsite.

No drains were observed. The bathroom sink drains through the septic system.

A 200 gallon above ground tank that stores water was observed.

No well exists onsite; water is supplied by a reserve tank.

SQG: universal waste, newspaper and tape

Acorn Dry Cleaners

Interviewed Raudirick Nasario on (August 31, 2011)

Acorn has operated at this site for 40 years and was the first and only tenant in this building space.

One 55-gallon drum of Dowper (tetrachloroethene) is used at the site. Acorn uses one 55-gallon drum of tetrachloroethene every 15 months. Drum is stored directly on the floor without secondary containment.

One above-ground 500-gallon diesel storage tank is present in the southwest corner of the building parking lot. Diesel is used for the boiler to produce steam. Acorn uses approximately 75-100 gallons of diesel per month.

December 19, 2011

Page 7

Two above-ground 400-gallon water tanks are located outside just off the southwest corner of the building. A chiller is located in the same area as the water tanks.

Four storm drains were located at the edge of the building parking lot along the west side of the building.

One drain was located in the alley below the northwest corner of Acorn cleaners.

A hole in the terrazzo tile floor was observed in the south part of the building where steam pipes ran from the first floor to a former furnace/boiler located in the basement. CDM accessed the basement and did not observe staining in area beneath the hole in the floor.

Acorn has one dry cleaning machine and two air compressors (one is out of service). Water is pumped from outside water tanks to two 55-gallon water tanks inside. The dry cleaning machine needs high water pressure for proper functioning. Two boilers are located in the shed below the 400 gallon water tanks. The older non-working boiler was connected to pipes in the basement that ran through the hole in the floor to the first floor dry cleaning room. The boiler that is in use is connected to the first floor dry cleaning room by elevated pipes.

The owner said that approximately 3 gallons of Dowper (tetrachloroethene) is poured into the machine. This amount lasts around 3 to 4 months. Most of the tetrachloroethene is vaporized during the dry cleaning process. Only a solid paste is recovered as waste at the end of the process.

For every 55 gallon drum of tetrachloroethene, 30 gallons of waste is generated. This amount of waste is generated over a 15 month period. The waste was described as a solid paste not a liquid and is stored in a 30 gallon drum inside of the facility. Filters for the dry cleaning machine trap lint released from the cloth and are stored in a 55-gallon drum. Acorn disposes of approximately four of these filters per year. Waste is collected once a year by Safety Kleen, Inc.

The owner of the building said he did not have an underground utility plan. He did say that an electric line runs from near the diesel tank shed to the southwest side of the building where the electric meters are.

Fenwal Baxter

Jose Nieves, Engineer director and Joann Molina, Safety Engineer, Fenwal Baxter were interviewed on September 9, 2011. Mr. Nieves has been an employee since 1995.

Fenwal Baxter has operated onsite for approximately 16 years. The facility has 3 shifts; 6:30AM - 3:30PM, 3:00PM -11:00PM and 11:00PM -6:00AM, 7 days/week.

Plant operated 24/7, Subcontractor can only work in the facility from 8:00 to 5:00.

Fenwal has two buildings, one for process and other for storage. The plant mainly produces medical devices and its components for the blood collection. They also pre-assemble other products of the same origin but in an external facility in Dominican Republic. All office and production area flooring is

December 19, 2011

Page 8

tile. Flooring in the warehouse is in polished concrete. J. Reyes observed a drain at the loading dock of the receiving area which points as a drain for washing that area. No information was available as to where the drain connects. It is assumed to connect to the sewer drain line.

Chemicals used onsite:

1. Isopropanol / Sanitizing process
2. Muriatic Acid 36% / control ph.
3. Sodium Hydroxide liquid / control ph.
4. Methylene Chloride
5. Methylethyketone
6. Ciclohexanone
7. Alchohol 70 %

MSDSs are available onsite.

One two-inch diameter drain was observed at the receiving loading dock area. The drain's purpose is unknown and is assumed to be connected to the sewer line of the facility.

ASTs: Two above ground storage tanks of 6,000 gallons and 3,000 gallons contain diesel. Two above ground storage tanks of 40, 000 gallons and 250 gallons contain water and are used for backup in case PRASA shuts down the services.

No well exists onsite. Water is supplied by PRASA.

SQG: universal waste (Waste Management), oil, fluorescent lamps, solid hazardous waste, liquid hazardous waste (Veolea) and biomedical waste goes to (Onyx Environmental)

Former PCB Horizon (HP)

Jose Reyes and Brendan MacDonald visited the facility of PCB Horizon on September 8, 2011. Rebecca Santiago, PRIDCO representative, gave CDM personnel access to the facility. She informed that former tenant is still running a groundwater system but she is not familiar with the data. It should be available at the Environmental Department at PRIDCO.

Abandoned Gulf Gas Station

Jose Reyes and Brendan MacDonald visit the property on September 2, 2011. Jose Reyes tried to contact the previous owner of this property, yet no contact was established for an interview at the time of the walkover. This property was acquired by the Puerto Rico Highway Authority for the construction of a new bridge along the State Road PR #122.

WALLACE SILVERSMITH

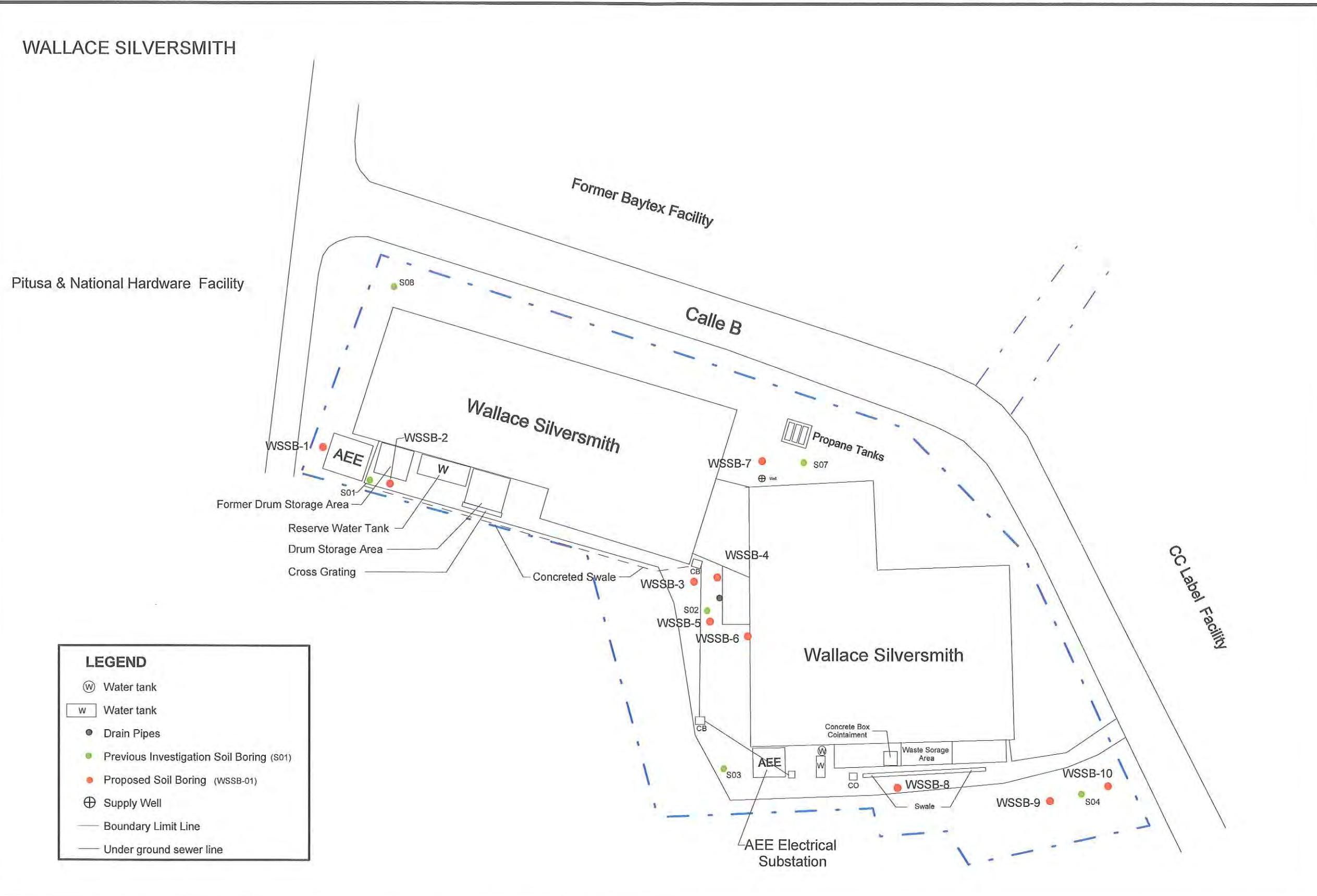
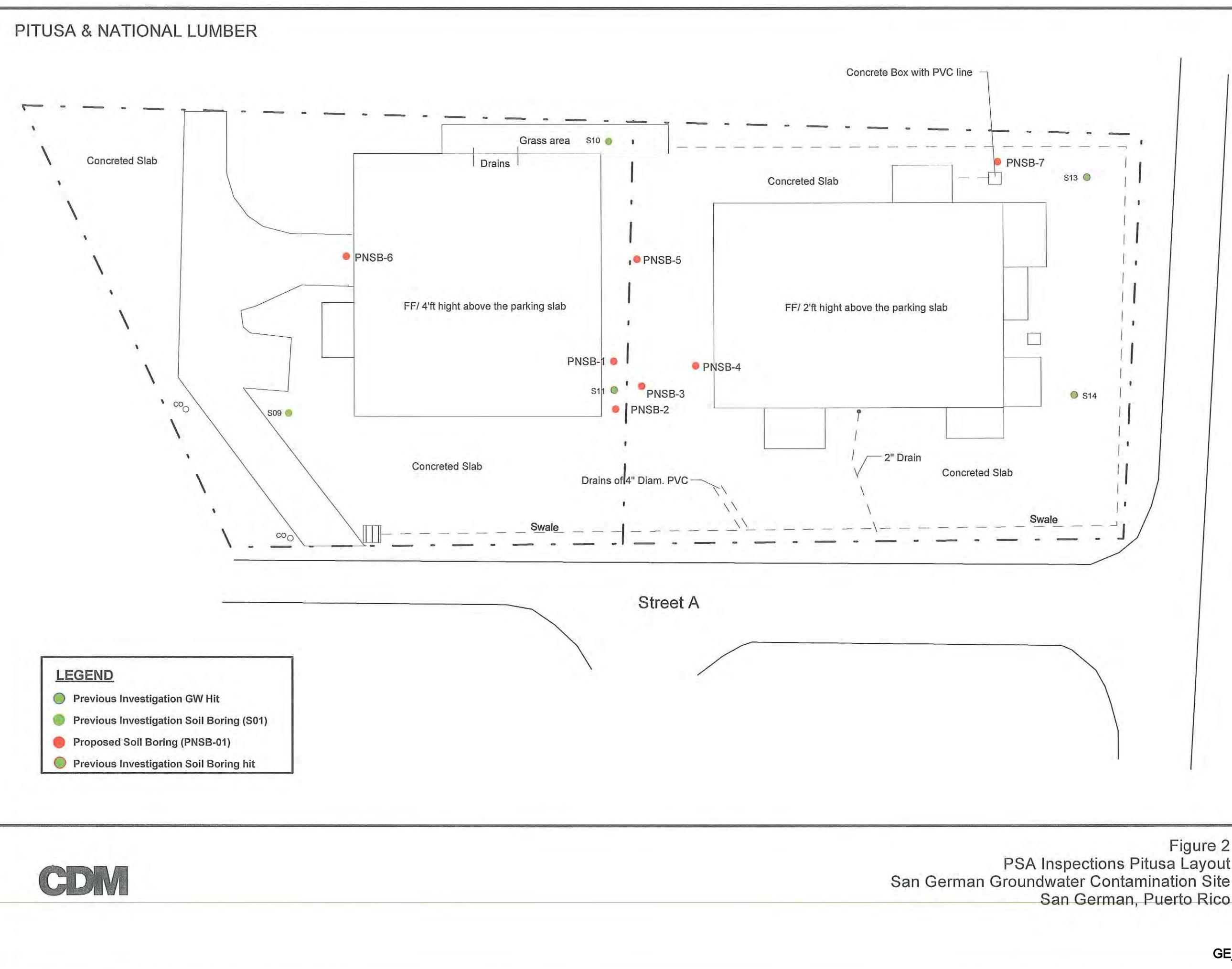
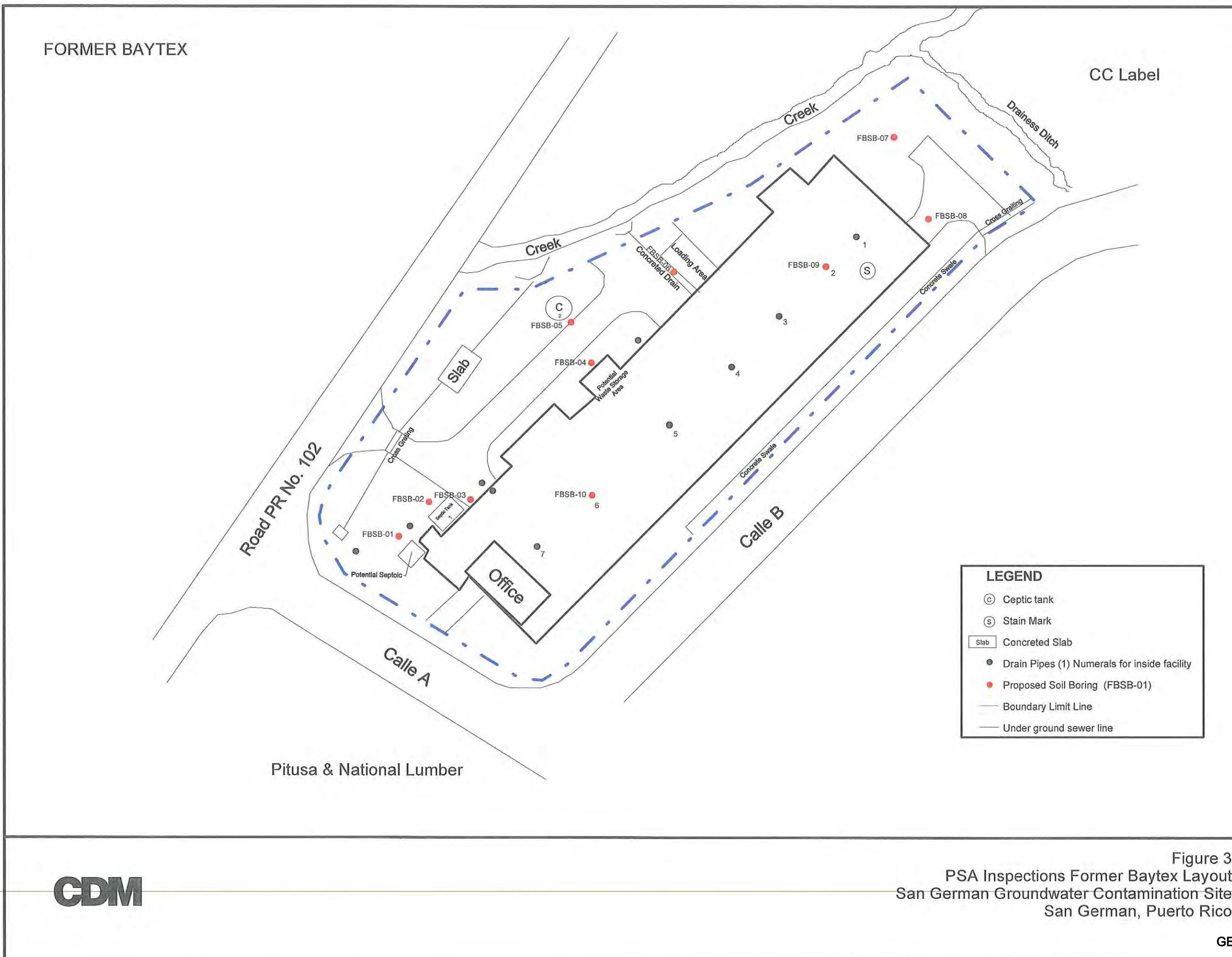
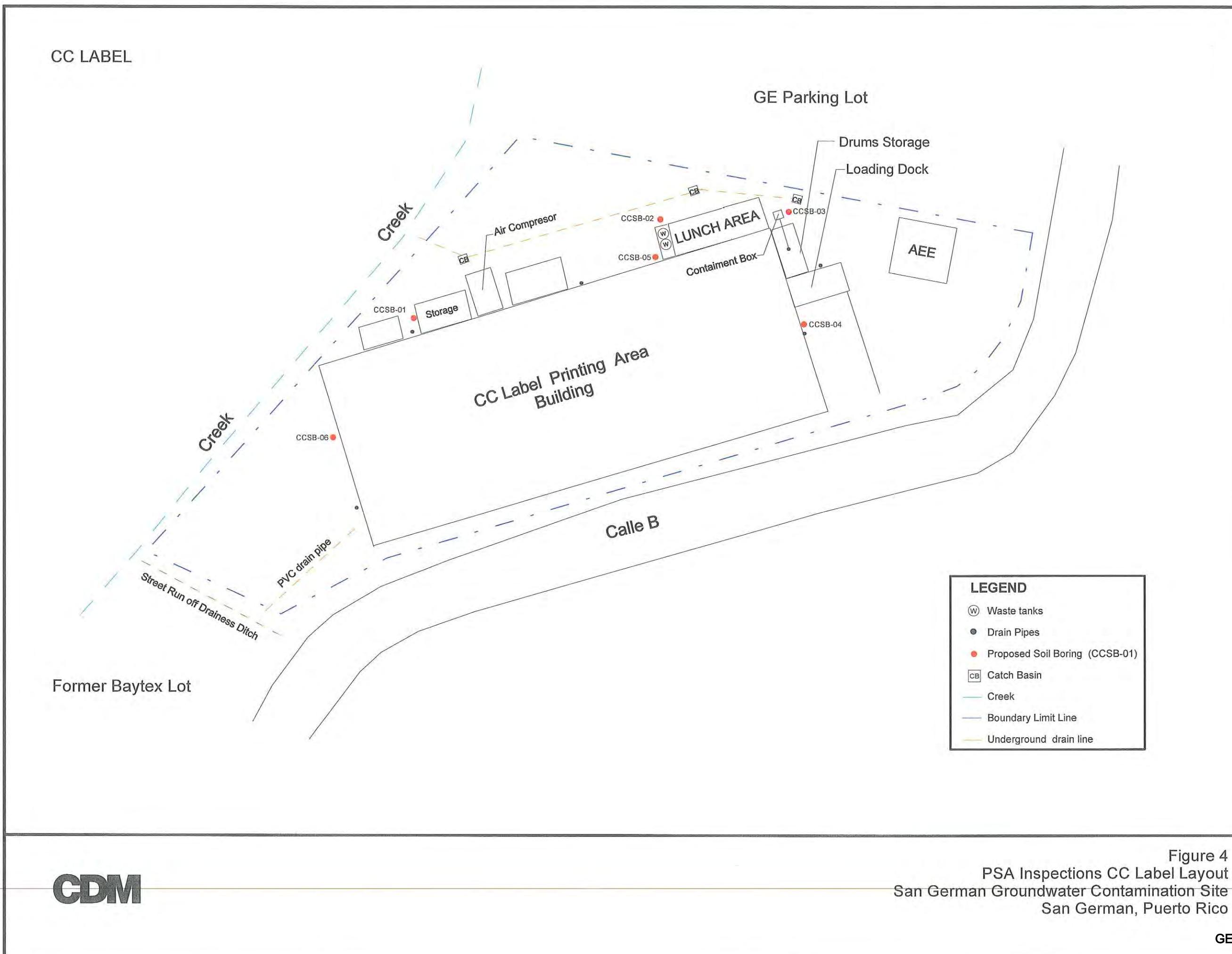


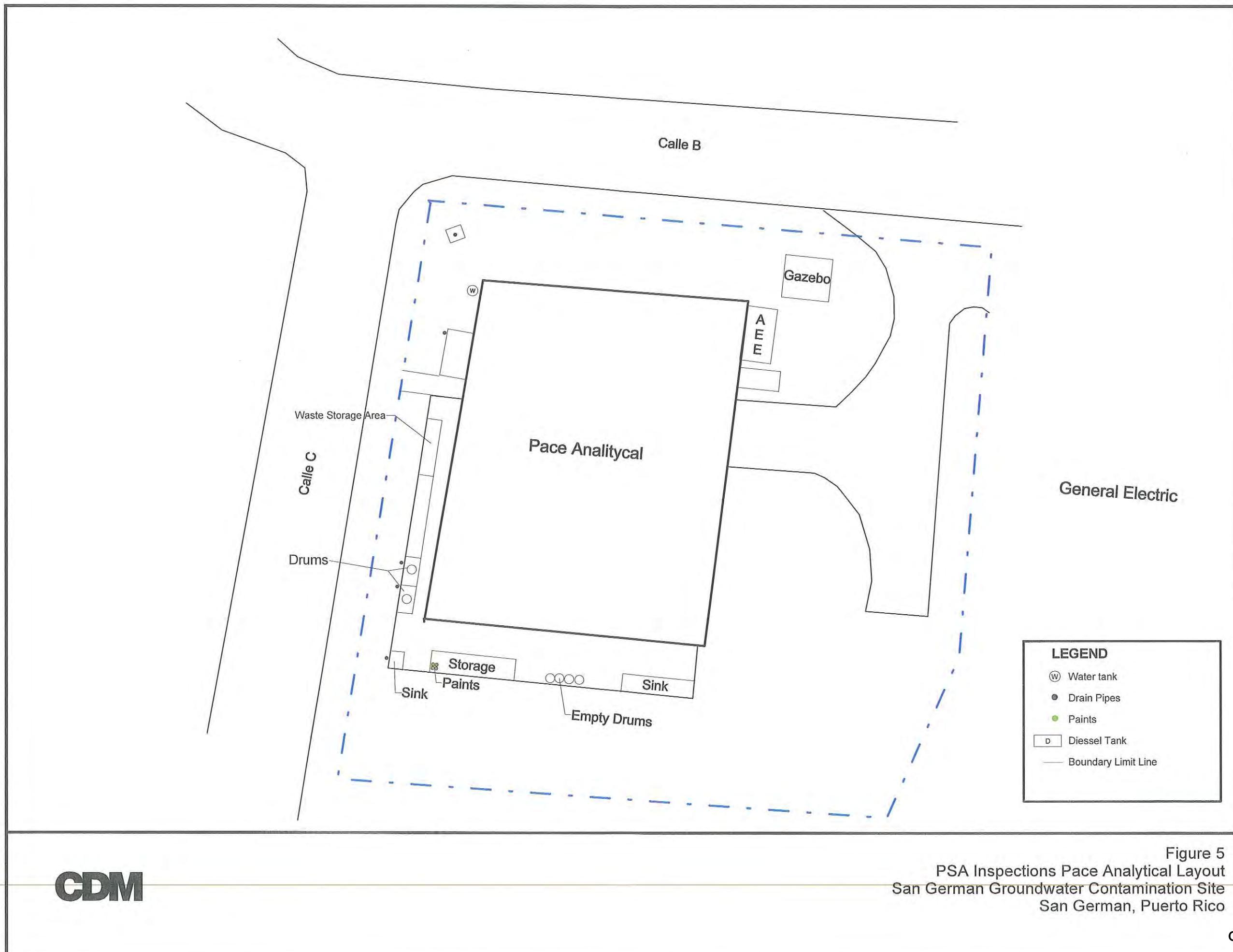
Figure 1
PSA Inspections Wallace Silversmith Layout
San German Groundwater Contamination Site
San German, Puerto Rico

PITUSA & NATIONAL LUMBER









GENERAL ELECTRIC

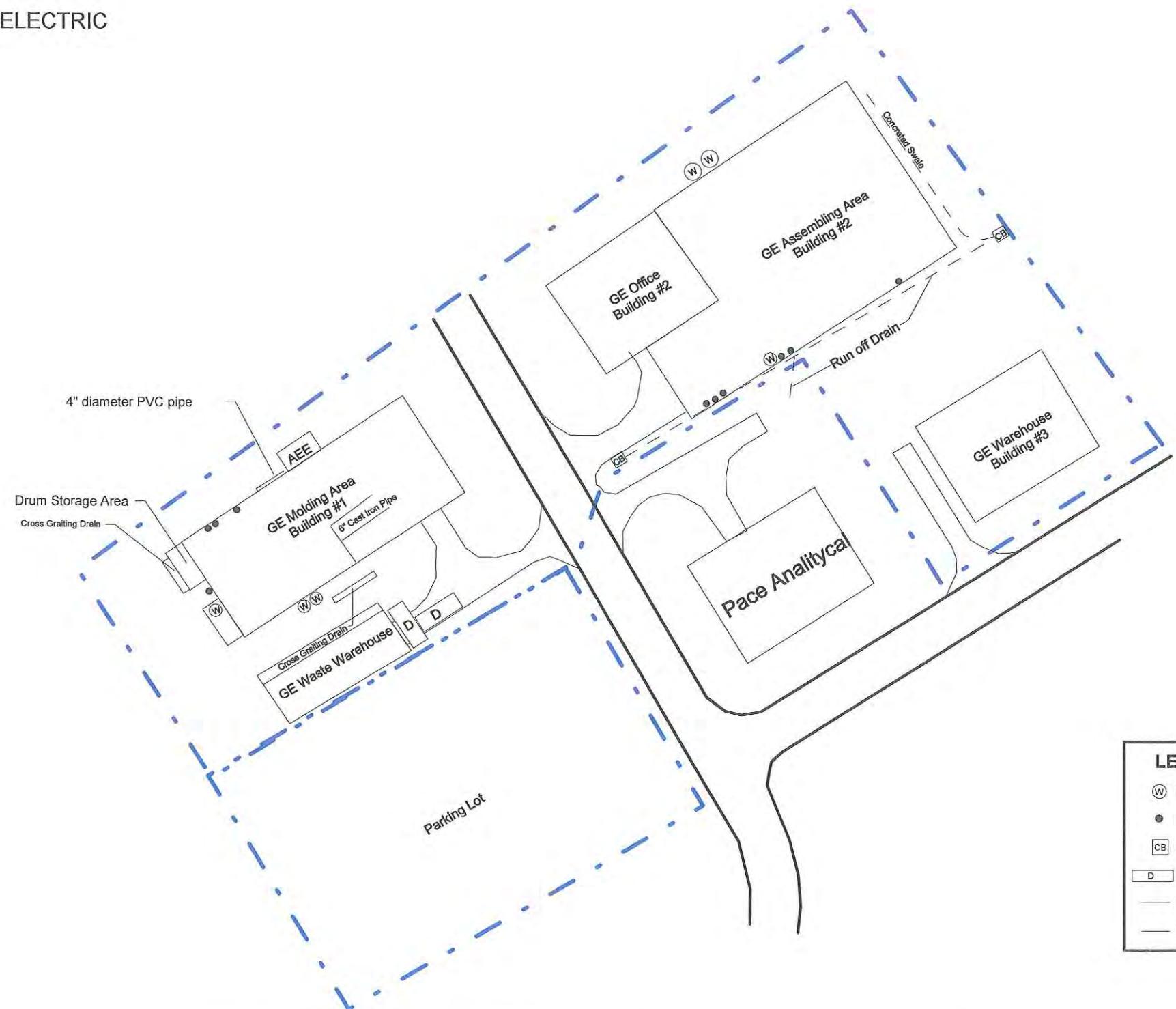


Figure 6
PSA Inspections GE Layout
San German Groundwater Contamination Site
San German, Puerto Rico

CDM

GE_SG001237

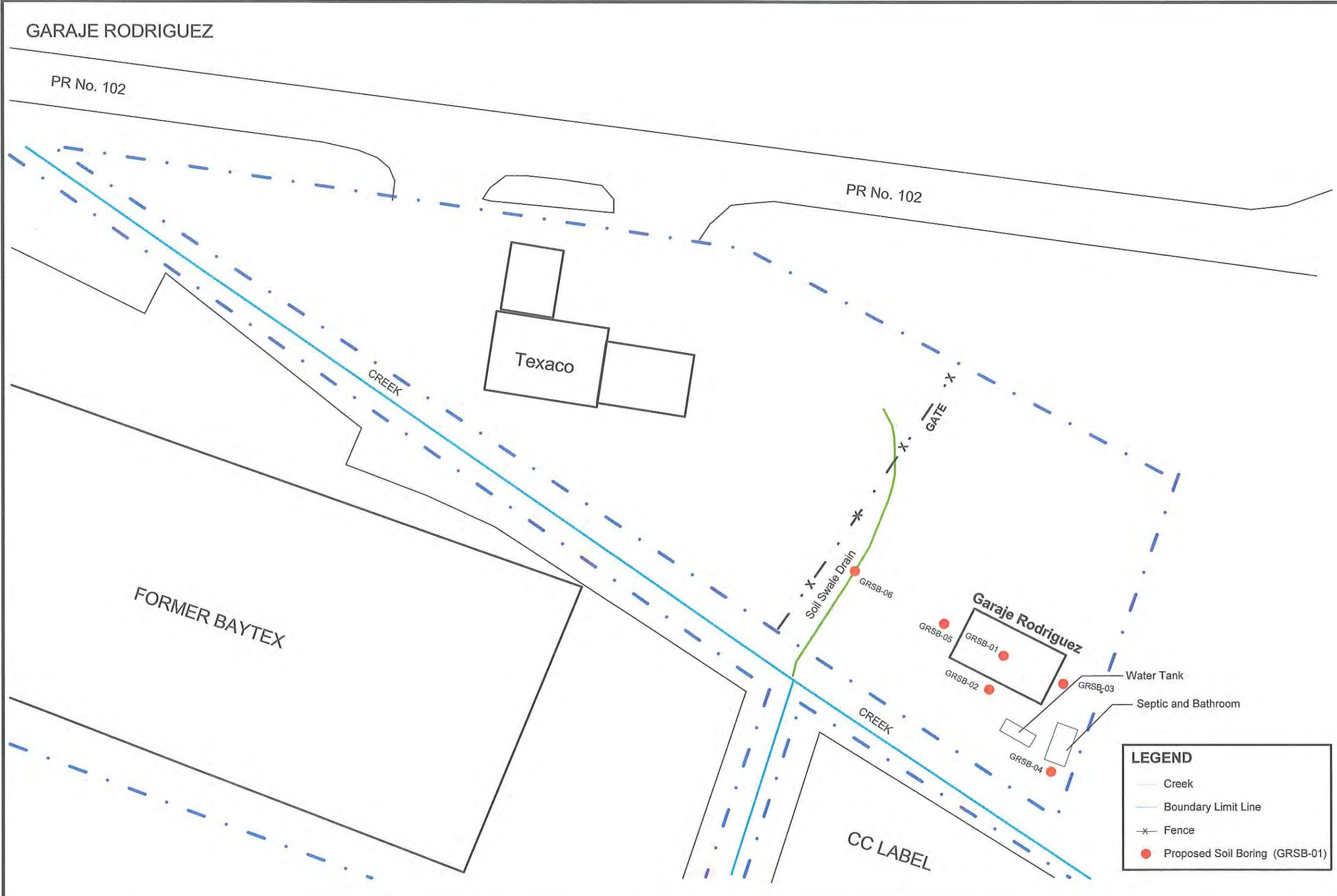
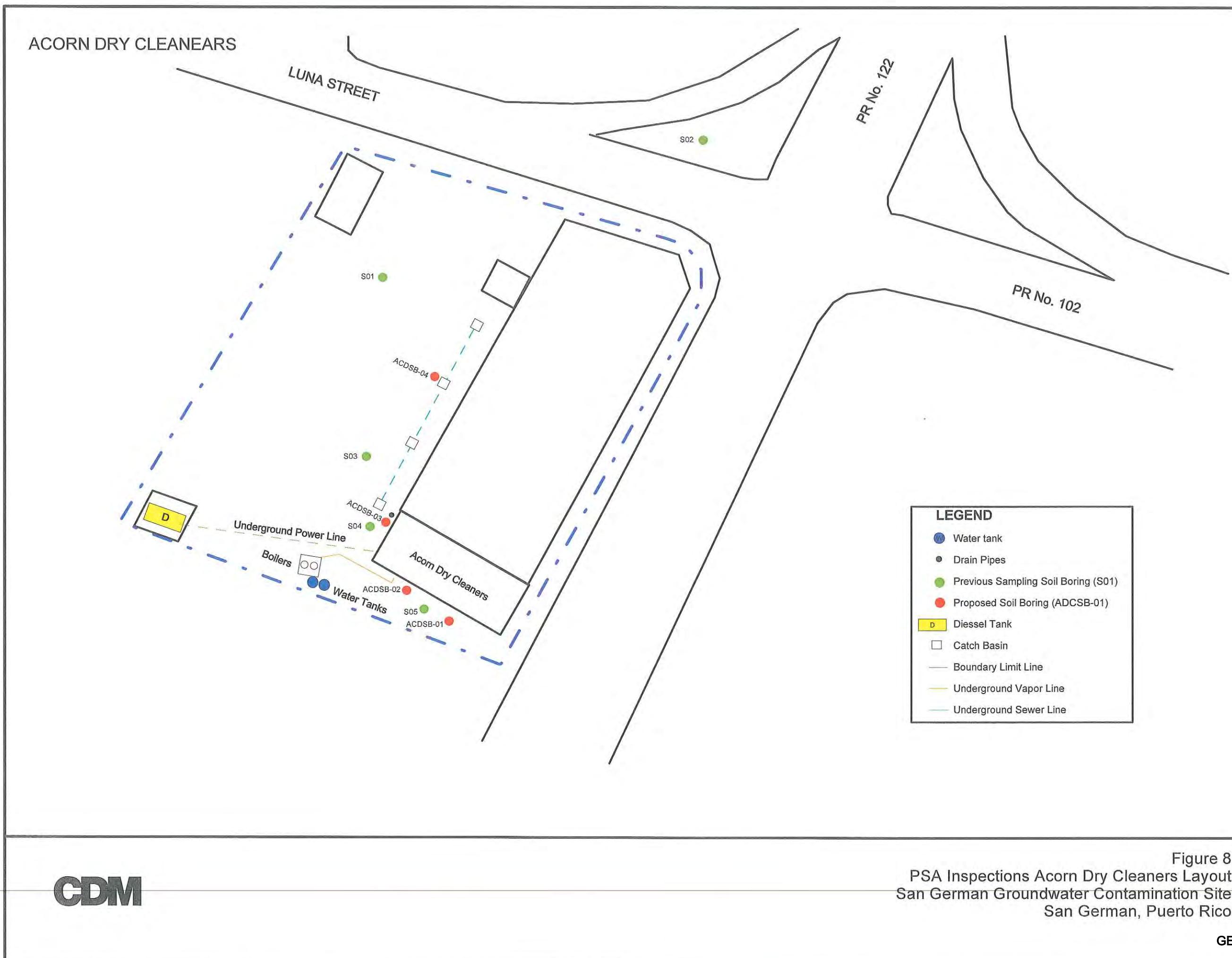


Figure 7
PSA Inspections Garaje Rodriguez Layout
San German Groundwater Contamination Site
San German, Puerto Rico



FENWAL BAXTER

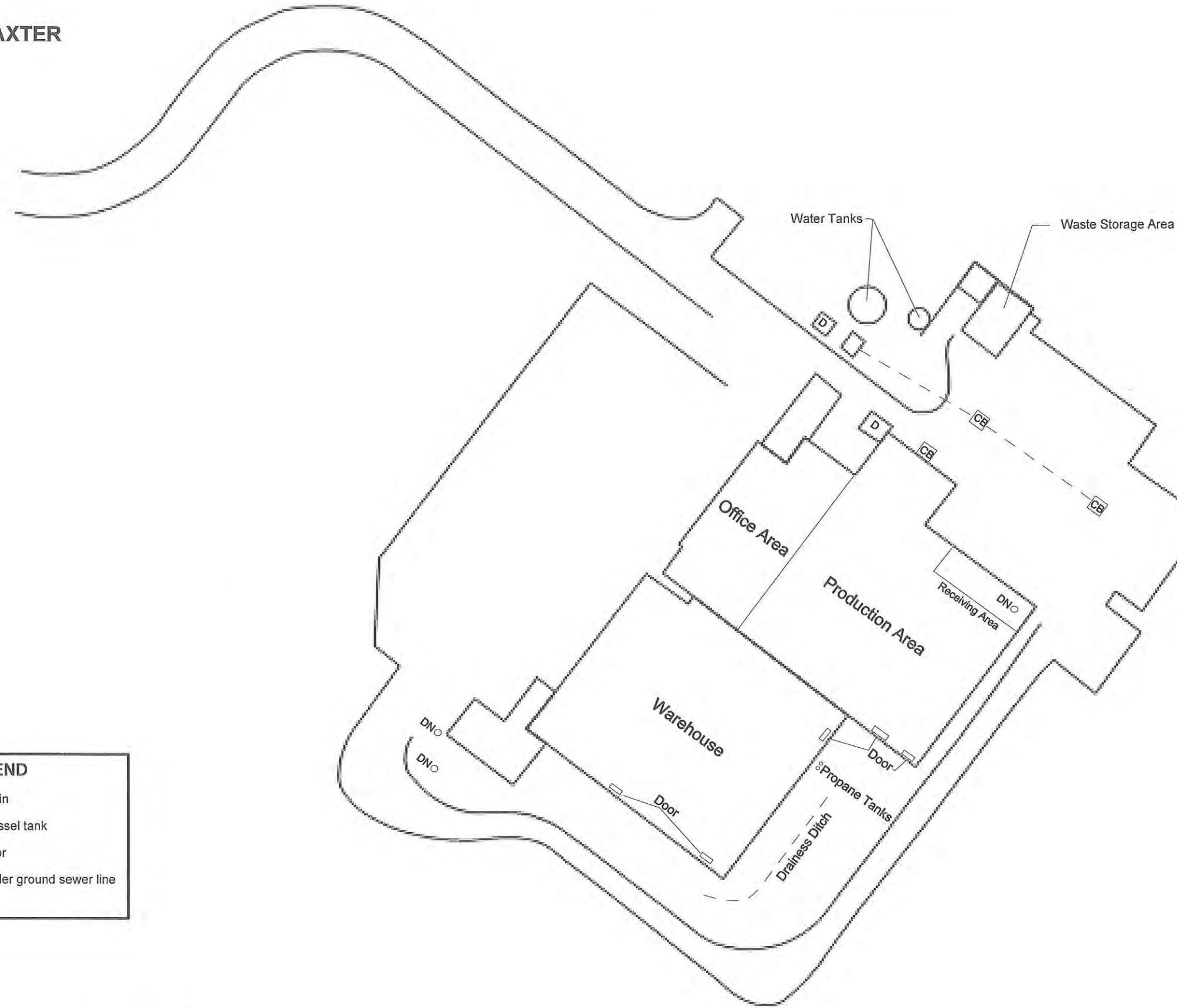
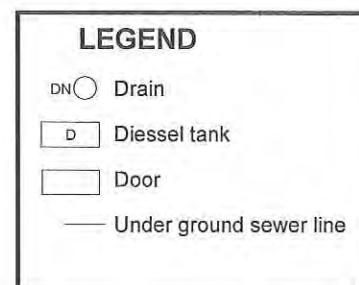


Figure 9
PSA Inspections Fenwal Baxter Layout
San German Groundwater Contamination Site
San German, Puerto Rico

CDM

GE_SG001240

TABLE 1 - PSA INSPECTION PROPOSED SAMPLING

Southern Area		
Property ID		
Sample ID		
Sample Location Rationale		
Wallace Silversmith	WSSB-1	West of substation close to proposed monitoring well location and near previous Weston sample location (WI-01) with soil and groundwater VOC detections
	WSSB-2	South of drum storage area and east of previous Weston sample location (WI-01) with soil and groundwater VOC detections
	WSSB-3	Adjacent to catch basin and northwest of previous Weston sample location (WI-03) with soil and groundwater VOC detections
	WSSB-4	Adjacent to catch basin and northeast of previous Weston sample location (WI-03)
	WSSB-5	South of previous Weston sample location (WI-03)
	WSSB-6	Southeast of previous Weston sample location (WI-03) and near access door
	WSSB-7	Adjacent to existing well and west of previous Weston sample location (WI-07) with groundwater VOC detections
	WSSB-8	South of concrete containment Box and Waste Storage Area
	WSSB-9	West of previous Weston sample location (WI-04)with soil and groundwater VOC detections
	WSSB-10	East of previous Weston sample location (WI-04)with soil and groundwater VOC detections
Former Baytex	FBSB-1	Between potential septic tank and drainage pipe
	FBSB-2	Northwest of septic tank #1
	FBSB-3	Along the southside of the ramp north of the septic tank
	FBSB-4	North of potential waste storage area
	FBSB-5	Southeast of septic tank #2
	FBSB-6	South of the loading dock and close to concrete swale
	FBSB-7	Adjacent to conrete patch (potential underground storage tank)
	FBSB-8	Delivery ramp northesat corner of the building
	FBSB-9	Adjacente to floor drain #2 inside the building
	FBSB-10	Adjacente to floor drain #6 inside the building
Pitusa and National Lumber	PNSB-1	North of previous Weston sample location (WI-11) with soil VOC detections
	PNSB-2	South of previous Weston sample location (WI-11) with soil VOC detections
	PNSB-3	East of previous Weston sample location (WI-11) with soil VOC detections
	PNSB-4	Concrete patch on floor
	PNSB-5	South of previous Weston sample location (WI-10)
	PNSB-6	Northwest loading dock area
	PNSB-7	North of box culvert at the northeast side of the property
Acorn Dry Cleanears	ADCSB-1	Southside of the building ten feet east of previous Weston sample location (AC-05) with soil VOC detections
	ADCSB-2	Southside of the building ten feet west of previous Weston sample location (AC-05) with soil VOC detections
	ADCSB-3	Westside of the building adjacent to drain northeast of previous Weston sample location (AC-04)
	ADCSB-4	Westside of the building adjacent to catch basin southeast of previous Weston sample location (AC-01)
Southern Area - Possible Additions		
CC Label	CCSB-1	Adjacent to machine storage area front door
	CCSB-2	North of waste storage tank area
	CCSB-3	North of the drum storage area catch basin
	CCSB-4	South of the main loading dock near drainage pipe
	CCSB-5	West of the drum storage area catch basin
	CCSB-6	West loading dock area
Garaje Rodriguez	GRSB-1	Interior of paintshop on concrete slab
	GRSB-2	Adjacent to southside of paintshop near storage shed
	GRSB-3	Adjacent to eastside of paintshop
	GRSB-4	Adjacent to the southside the bathroom and septic tank
	GRSB-5	Adjacent to westside of paintshop entrance
	GRSB-6	Adjacent to the soil swale along the westside the baundary
Pace Analytical		Not Recommended
General Electric		Not Recommended
Northern Area		
Property ID	Sample ID	Sample Location Rationale
Fen Wall Baxter	N/A	NOT REQUIRED
Former PCB Horizon	N/A	NEED TO REQUEST RECENT MONITORING REPORT
Abandoned Gulf Gas Station	N/A	NEED THE PHASE II REPORT FROM PRHA